1

I, Tiffany R. Ellis, hereby declare as follows:

2 3

4

5

the States of Michigan and Illinois and duly admitted to practice before this Court, representing

6

Special Master Review on April 24, 2025.

7 8

9

10

11

12

13 14

15 16

17

18

19

21

20

22 23

24 25

26

27

28

¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2. See ECF No. 2357.

- I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in Plaintiffs in the above caption action.
- 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
- 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for Special Master Review filed by All Plaintiffs on March 4, 2025. See ECF No. 2434. Plaintiffs incorporate the brief to support the specific reasons each entry on the List of Disputed Entries was challenged. The Brief included the general background of the privilege dispute process to date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a general argument for the challenges Plaintiffs raised.
- 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on April 24, 2025 contained entries still in dispute for custodian Mike Akamine.
- 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on April 24, 2025 did not contain any entries for the custodians that overlapped with custodians already submitted to the Special Master for review.

Mike Akamine

- 6. Defendants included approximately 949 entries for Mike Akamine across its Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.
 - 7. Plaintiffs originally challenged approximately 495 of these 949 entries.
- As of January 31, 2025¹, Defendants withdrew their claim of privilege to 100 8. entries in full and 38 entries in part.
- 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants withdrew their claim of privilege to 249 entries in full and 89 entries in part.

- 10. Defendants provided Plaintiffs with a revised Privilege Log on April 21, 2025. In total, to date, Defendants logged 1,996 entries for Mike Akamine and have withdrawn their claim of privilege to approximately 268 entries in full and 139 entries in part.
- 11. On March 25, 2025, Plaintiffs provided the Special Master and Defendants with a list of 22 entries in dispute for Mike Akamine following a review of Uber's revised privilege log that included updated or additional information provided by Uber, documents produced with redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' March 14, 2025 privilege log.
- 12. On April 16, 2025, Plaintiffs provided the Special Master and Defendants with a supplemental list of 34 entries for Mike Akamine from Defendants' Marh 24, 2025, April 1, 2025, April 8, 2025, April 11, 2025, and April 16, 2025 privilege logs.
- 13. On April 21, 2025, Defendants provided written response to Plaintiffs' list and the parties met and conferred. During the meet and confer process, Defendants informed Plaintiffs that they withdrew their claim to 5 entries in full and 13 entries in part since the submission on March 25, 2025.
- 14. On April 21, 2025 Plaintiffs provided the Special Master and Defendants with a list of 49 entries that remain in dispute for Mike Akamine. The list did include 2 entries that Defendants stated they would produce redacted versions at a future date and 2 entries Defendants they would produce in full at a future date.
- 15. On April 24, 2025 Plaintiffs provided the Special Master and Defendants with a list of 45 entries that remain in dispute for Mike Akamine following the review of the newly redacted documents.

Executed this 24th day of April, 2025 in Detroit, Michigan.

/s/ Tiffany R. Ellis Tiffany R. Ellis